

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CORDIA FOSTER and CISLYN WRIGHT,

Index No. 21-cv-11224

*Plaintiffs,*

-against-

**DEFENDANTS' PROPOSED  
VOIR DIRE QUESTIONS**

ELYSE DULA a/k/a ELYSE SNOW,  
and IAN K. SNOW,

*Defendants.*

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Pursuant to the provisions of Rule 47(a) of the Federal Rules of Civil Procedure, Defendants Elyse Dula a/k/a Elyse Snow and Ian K. Snow requests that the Court pose the following questions to prospective jurors during voir dire, or, in the alternative, that the Court permit counsel for the Parties to examine prospective jurors on the following questions:

**General Examination Questions:**

1. Please state where and in what capacities you and all the members of your household are employed.
2. Have you ever served on a jury before? If so, please identify the location and nature of the case or cases on which you served.
3. Have you, or has any member of your household, ever been a party to a lawsuit? If so, please explain.
4. If the Plaintiffs do not meet their burden of proof as to their claims of discrimination or retaliation, would you be able to turn the Plaintiffs away without compensation?
5. Are you familiar with any of the attorneys or their law firms? If so, what are the circumstances?

**Common Experience Questions:**

6. Have you, or has any member of your family, ever brought an action under U.S.C. § 1981, or the New York State Human Rights Law? If so, please provide details.

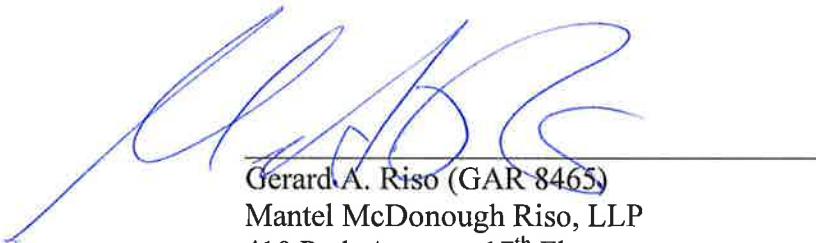
7. Have you, or has any member of your family, ever been the victim of discrimination, harassment, or retaliation in the workplace? If so, please provide details.
8. Have you ever felt that a supervisor/co-worker treated you differently because of your race/sex/national origin/etc.? If so, please provide details.
9. Have you made any complaints to human resources about a co-worker or supervisor? If so, please provide details, including how you felt the company handled such complaint.
10. Have you ever filed a charge of discrimination with the Equal Employment Opportunity Commission (EEOC) or any state equivalent? If so, please provide details, including the results of such charge.
11. Do you believe that if an employee feels that he or she were subject to discrimination, harassment, or retaliation, it is his or her obligation to raise such feelings with his or her employer?
12. Do you feel that employees bear ultimate responsibility for their workplace conduct?
13. Have you ever been involuntarily terminated from a job? If so, please provide details.
14. Have you ever felt compelled to resign from a job because of the working conditions? If so, please provide details.
15. Have you ever worked in a role in which you provided childcare services? If so, please provide details.
16. Do you have Children? If so, what age?
17. Have you ever hired childcare service providers to care for your Children? If so, please provide details.

**Prejudice Questions:**

18. This is a matter in which the Plaintiffs have sued the Defendants, alleging racial discrimination and retaliation. Would you have any difficulty being completely fair and impartial in such a case? Do you have information related to this question that you would like to share?
19. Do you have any feelings, positive or negative, about African Americans who claim racial discrimination at work or their employers that could affect your ability to be completely fair and impartial?
20. Do you have any feelings, positive or negative, about high-net-worth individuals that could affect your ability to be completely fair and impartial?

21. Do you have any feelings, positive or negative, about individuals of Jamaican descent that could affect your ability to be completely fair and impartial?
22. Do you have any feelings, positive or negative, about individuals who are alleged to use racial slurs that could affect your ability to be completely fair and impartial?

Dated: December 16, 2022  
New York, New York



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